

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

JORGE AJEJANDRO ROJAS,
Plaintiff/Counter-Defendant,

vs.

Case. No. 2:23-cv-12140-LVP-EAS
Hon. District Court Judge Linda V. Parker
Hon. Magistrate Judge Elizabeth A. Stafford

DV INJURY LAW PLLC,
VENAR RAAD AYAR and
DANIEL P. HEILBRUN,
Defendants/Counter-Plaintiffs/
Third-Party Plaintiffs,

vs.

MARK NOWICKI,
Third-Party Defendant.

DEFENDANTS' OFFER OF JUDGMENT TO PLAINTIFF PURSUANT TO RULE 68

Defendants make the following Offer of Judgment pursuant to Rule 68:
Defendants pay Plaintiff \$1,500.00 (One-Thousand Five-Hundred Dollars) in
exchange for a Dismissal With Prejudice of Plaintiff's Complaint.

Respectfully submitted,
/S/ Mark L. Teicher (P34301)
Of Counsel
Law Office of Venar Raad Ayar, PLLC
30095 Northwestern Hwy., Suite 102
Farmington Hills, MI 48334

Dated: March 15, 2024

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Plaintiff/Counter-Defendant,

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DV INJURY LAW PLLC,
VENAR RAAD AYAR and
DANIEL P. HEILBRUN,
Defendants/Counter-Plaintiffs.

CERTIFICATE OF SERVICE

On March 15, 2024 I served:

Andrew Perrong, Esq. and Jeanne Barron, Esq.

Via email and U.S. Mail at:

a@perronglaw.com

and

Andrew Perrong, Esq.
2657 Mt. Carmel Ave.
Glendale, PA 19038

jbarron@jshlaw.com

and

Jeanne Barron, Esq.
3250 W. Big Beaver Rd., Suite 500
Troy, MI 48084

With a copy of:

Defendants' Offer Of Judgment To Plaintiff Pursuant To Rule 68 and the
Certificate of Service.

Respectfully submitted,

/s/Mark L. Teicher

Mark L. Teicher (P34301)

Dated: March 15, 2024